IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appellant:	Vijay V. SARASHETTI	§	Confirmation No.:		1087
		§			
Serial No.:	10/662,964	§	Group Art Unit:		2169
		§			
Filed:	09/12/2003	§	Examiner:	Truong V. Vo	
		§			
For:	Representing Records	§	Docket No.:	200600636-1	

APPEAL BRIEF

Mail Stop Appeal Brief – Patents   Date: July 9, 2009
Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

Sir:

  Appellant hereby submits this Appeal Brief in connection with the above-identified application. A Notice of Appeal was electronically filed on May 12, 2009.

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I.   REAL PARTY IN INTEREST

The real party in interest is Hewlett-Packard Development Company, L.P. (HPDC), a Texas Limited Partnership, having its principal place of business in Houston, Texas. HPDC is a wholly owned affiliate of Hewlett-Packard Company (HPC). The Assignment from the inventor to APPIQ was recorded on March 31, 2004, at Reel/Frame 015157/0792. The Assignment from the inventor to APPIQ, Inc., was recorded on September 16, 2004, at Reel/Frame 015786/0050. A merger document from APPIQ, Inc. to HPC was recorded on January 24, 2006, at Reel/Frame 017053/0592. An Assignment from HPC to HPDC was recorded on July 28, 2006, at Reel/Frame 018022/0983.

II.   RELATED APPEALS AND INTERFERENCES

Appellant is unaware of any related appeals or interferences.

III.   STATUS OF THE CLAIMS

Originally filed claims: 1-26.

Claim cancellations: None.

Added claims: 27-38.

Presently pending claims: 1-38.

Presently appealed claims: 1-38.

IV.   STATUS OF THE AMENDMENTS

No claims were amended after the final Office action dated March 12, 2009.

V.   SUMMARY OF THE CLAIMED SUBJECT MATTER

This section provides a concise explanation of the subject matter defined in each of the independent claims, referring to the specification by page and line number or to the drawings by reference characters as required by 37 C.F.R. § 41.37(c)(1)(v). Each element of the claims is identified with a corresponding reference to the specification or drawings where applicable. The specification references are made to the application as filed by Appellant. Note that the citation to passages in the specification or drawings for each claim element does not imply that the limitations from the specification and drawings should be read into the corresponding claim element. Also note that these specific references are not exclusive; there may be additional support for the subject matter elsewhere in the specification and drawings.

Embodiments are directed to methods and systems for collecting and storing records. As an example, satellite offices of a brokerage house collect buy/sell orders for stocks, bonds, and other types of securities. The orders collected at each satellite office may be aggregated into a record that is periodically transferred to a central storage site. Some of the records produced by the order collection sites and transferred to the central storage site are hierarchical tree structures. See Fig. 1 and line 18, col. 3 – line 3, page 6. The various claims are represented in the table below.

Claimed subject matter on appeal	Citation to specification/drawings
1. A computer implemented method for representing records, the method comprising:	See at least page 14, lines 15-26
receiving an order for a transaction at a record collection site {12, Fig. 1};	See at least Fig. 1 and page 3, lines 28-29
producing a record {38, Fig. 1} that represents the transaction at the record collection site {12};	See at least Fig. 1 and page 3, line 30-page 4, line 1
storing the record {38} in a memory location in a computer readable storage medium {32, Fig. 1} at the record collection site {12};	See at least Fig. 1 and page 4, lines 1-2
assigning a unique identifier to	See at least Fig. 1 and page 4, lines

the record {38} stored at the record collection site {12};	10-14
entering the unique identifier in a hierarchical tree structure {40, Fig. 1} stored in a computer readable storage medium {32} at the record collection site {12}, wherein the unique identifier comprises information for accessing the record {38} in the memory location, and wherein the tree structure {40} comprises a plurality of branches connected by nodes; and	See at least Fig. 1; page 4, lines 14-16; page 9, lines 12-15; and page 10, lines 13-22
sending the hierarchical tree structure {40} to a central storage site {18, Fig. 1}.	See at least Fig. 1 and page 5, lines 13-20
9. A computer program product, recorded in a computer-readable storage medium comprising logic instructions which, when executed on a processor, cause the processor to:	See at least page 14, lines 15-26
receive an order for a transaction at a record collection site {12, Fig. 1};	See at least Fig. 1 and page 3, lines 28-29
produce a record {38, Fig. 1} that represents the transaction at the record collection site {12};	See at least Fig. 1 and page 3, line 30-page 4, line 1
store the record {38} in a memory location at the record collection site {12};	See at least Fig. 1 and page 4, lines 1-2
assign a unique identifier to the record {38} stored at the record collection site {12};	See at least Fig. 1 and page 4, lines 10-14
enter the unique identifier in a hierarchical tree structure {40, Fig. 1} stored at the record collection site {12}, wherein the unique identifier comprises information for accessing the record {38} in the memory location, and wherein the tree structure {40} comprises a plurality of branches connected by nodes; and	See at least Fig. 1; page 4, lines 14-16; page 9, lines 12-15; and page 10, lines 13-22
send the hierarchical tree structure {40} to the central storage site {18, Fig. 1}.	See at least Fig. 1 and page 5, lines 13-20

17. A computer implemented method for representing records, the method comprising:	See at least page 14, lines 15-26
receiving an order for a transaction at a record collection site {12, Fig. 1};	See at least Fig. 1 and page 3, lines 28-29
producing a record {38, Fig. 1} that represents the transaction at the record collection site {12};	See at least Fig. 1 and page 3, line 30-page 4, line 1
storing the record {38} in a computer readable storage medium {32, Fig. 1} in a memory location at the record collection site {12};	See at least Fig. 1 and page 4, lines 1-2
assigning a unique identifier to the record {38} stored at the record collection site {12};	See at least Fig. 1 and page 4, lines 10-14
entering the unique identifier in a hierarchical tree structure {40, Fig. 1} stored in a computer readable storage medium {32} at the record collection site {12}, wherein the unique identifier comprises information for accessing the record {38} in the memory location, and wherein the tree structure {40} comprises a plurality of branches connected by nodes;	See at least Fig. 1; page 4, lines 14-16; page 9, lines 12-15; and page 10, lines 13-22
sending the hierarchical tree structure {40} to a central storage site {18, Fig. 1}; and	See at least Fig. 1 and page 5, lines 13-20
receiving the hierarchical tree structure {40} at the central storage site {18} from a record collection site {12}, the hierarchical tree structure {40} includes the unique identifier assigned to a record {38} stored at the record collection site {12}.	See at least Fig. 1; page 5, lines 13-20; page 4, lines 26-29; and page 8, lines 6-9
21. A computer implemented method for representing records, the method comprising:	See at least page 14, lines 15-26
receiving an order for a transaction at a record collection site {12, Fig. 1};	See at least Fig. 1 and page 3, lines 28-29
producing a record {38, Fig. 1} that represents the transaction at the record collection site {12};	See at least Fig. 1 and page 3, line 30-page 4, line 1

storing the record **{38}** in a computer readable storage medium **{32, Fig. 1}** in a memory location at the record collection site **{12}**;	See at least Fig. 1 and page 4, lines 1-2
assigning a unique identifier to the record **{38}** stored at the record collection site **{12}**;	See at least Fig. 1 and page 4, lines 10-14
entering the unique identifier in a hierarchical tree structure **{40, Fig. 1}** stored in a computer readable storage medium **{32}** at the record collection site **{12}**, wherein the unique identifier comprises information for accessing the record **{38}** in the memory location, and wherein the tree structure **{40}** comprises a plurality of branches connected by nodes;	See at least Fig. 1; page 4, lines 14-16; page 9, lines 12-15; and page 10, lines 13-22
sending the hierarchical tree structure **{40}** to a central storage site **{18, Fig. 1}**; and	See at least Fig. 1 and page 5, lines 13-20
using the unique identifier at the central storage site **{18}** to access the record **{38}** stored at the record collection site **{12}**.	See at least page 7, lines 26-28
24.　A system comprising:	
a record collection site **{12, Fig. 1}** that includes a computer system comprising logic instructions recorded on a computer readable storage medium which, when executed on computer system, cause the computer system to assign a unique identifier to a record **{38, Fig. 1}** stored at the record collection site **{12}** and enter the unique identifier in a hierarchical tree structure **{40, Fig.1}**; and	See at least Figs 1-2; page 4, lines 10-14-16; and page 14, lines 15-26
a central storage site **{18, Fig. 1}** that includes a computer system comprising logic instructions recorded on a computer readable storage medium which, when executed on computer system, cause the computer system to receive the hierarchical tree structure **{40}** from the record collection site **{12}**.	See at least Figs. 1-2; page 5, lines 13-20; page 4, lines 26-29; page 8, lines 6-9; and page 14, lines 15-26

VI.   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Whether claims 1-38 are obvious under 35 U.S.C. § 103(a) over U.S. Pub. No. 2004/0198555 ("*Anderson*") in view of U.S. Pat. No. 5,295,261 ("*Simonetti*").

VII.   ARGUMENT

A.   Whether claims 1-38 are obvious under 35 U.S.C. § 103(a) over *Anderson* in view of *Simonetti*

1.   Claims 1-8 and 27-29

Claim 1, in part, requires "sending the hierarchical tree structure to a central storage site." The Examiner appears to admit that none of the cited references alone teaches the above limitation and argues that, if modified, Anderson would teach the limitation. See Final Office Action dated 03/12/09, page 7, first full paragraph. Appellant respectfully asserts that the rejection is based on impermissible hindsight reconstruction in which only the Appellant's disclosure – not the cited references – provides the blueprint to make the suggested combination. The Examiner has not shown that *Anderson's* technique is compatible with or benefits from *Simonetti's* hierarchical tree structure. For example, the Examiner provides no explanation as to why modification of *Anderson's* technique to employ *Simonetti's* hierarchical tree structure would be obvious except for a vague motivation "to improve record keeping by using hierarchical database," which is presumed, by the Examiner, to be tremendously advantageous. See Final Office Action dated 03/12/09, page 7, second full paragraph. Appellant submits that there is no objective evidence to support the Examiner's assertions.

Even if *Anderson* were to implement a hierarchical database, there is no support for the Examiner's assertion that "sending the hierarchical tree structure to a central storage site" as in claim 1 would be the result of combining *Anderson* and *Simonetti*. For example, *Anderson* could implement a hierarchical tree structure as in *Simonetti* without ever sending the hierarchical tree structure to a central storage site as in claim 1. One skilled in the art would not find the claimed limitation "sending the hierarchical tree structure to a central storage cite" in the cited combination without improperly using the present disclosure as a blueprint.

Further, one skilled in the art could not easily implement a hierarchical tree structure in *Anderson* and doing so would require impermissibly changing

Anderson's principle of operation, which relies on sending temporary files from the handheld devices to a local server for storing/processing. See MPEP § 2143.01, Section VI. One of ordinary skill in the art would not think to program a handheld device (with limited processing, limited memory, and limited transmission bandwidth) to organize records into hierarchical tree structures and transmit the hierarchical tree structures due to a central storage site as in claim 1.

Claim 1 further requires "receiving an order for a transaction at a record collection site," "producing a record that represents the transaction at the record collection site" and "assigning a unique identifier to the record stored at the record collection site." The Examiner suggests that *Anderson* teaches these limitations at paragraphs [0045] and [0047]. However, *Anderson* is directed to exercise data collection rather than "an order for a transaction" as in claim 1. Further, *Anderson's* unique identifier is not related to a record that represents a transaction as in claim 1. Instead, *Anderson's* unique identifier (EIDM) is related to a particular exercise data source (*e.g.,* an exercise machine) at a health club facility. In other words, *Anderson's* EIDM is applied each time the corresponding exercise data source is accessed, which could occur many times by one or more persons. Thus, *Anderson's* EIDM is not comparable to Appellant's claimed unique identifier assigned to a record representing a transaction as is suggested by the Examiner.

The Examiner recognizes that *Anderson* does not teach "entering the unique identifier in a hierarchical tree structure stored in a computer readable storage medium at the record collection site" as in claim 1, and relies on *Simonetti* to support the obviousness rejection. See Final Office Action dated 03/12/09, page 6, paragraphs 3-4. However, the Examiner has not clearly articulated the reasons why it would be obvious to combine *Anderson* with *Simonetti's* hierarchical tree structure. Regarding the above limitation, the Examiner's proposed combination would require that *Anderson's* handheld devices store a hierarchical tree structure. However, due to the limited memory, bandwidth, and power typical of handheld devices, modifying *Anderson's*

handheld devices to store and to send a hierarchical tree structure as in claim 1 would not be obvious.

Based on the foregoing, Appellant respectfully requests that the obviousness rejections of claims 1-8 and 27-29 be reversed, and the claims set for issue.

a)   Claim 2

Claim 2 depends from claim 1 and is allowable for at least the same reasons. In addition, claim 2 requires "using the unique identifier to produce an aggregate report of records collected by the record collection site" and "sending the aggregate report to the central storage site." To support the rejection of claim 2, the Examiner cites *Anderson* at paragraphs [0045] and [0052]. See Final Office Action dated 03/12/09, page 8, item 7. However, nothing in the cited passages teaches or even suggests producing an aggregate report of records and sending the aggregate reports of records to a central storage site as in claim 2. Instead, *Anderson* simply mentions manually entering exercise data (for a single report) into a handheld device and uploading the exercise data to a local server. Further, the limited memory, bandwidth, and power typical of *Anderson's* handheld devices would lead those of skill in the art away from producing aggregate reports in the handheld devices and then transmitting these aggregate reports to the local server. As an example, *Anderson's* handheld devices only temporarily store exercise data (presumably due to the memory constraints). For at least these additional reasons, Appellant respectfully requests that the obviousness rejection of claim 2 be reversed and the claim set for issue.

b)   Claim 3

Claim 3 depends from claim 1 and is allowable for the same reasons. In addition, claim 3 requires "using the unique identifier at the central storage site to access the record stored at the record collection site." To support the rejection of claim 3, the Examiner cites *Anderson* at paragraphs [0057]. See Final Office Action dated 03/12/09, page 8, item 8. However, nothing in the cited passage teaches or even suggests that *Anderson's* local server uses an EIDM to access

records on handheld device. In *Anderson*, the EIDM is simply used to determine which exercise information sub-routine is executed on the handheld devices. See paragraph [0045]. For at least these additional reasons, Appellant respectfully requests that the obviousness rejection of claim 3 be reversed and the claim set for issue.

2. Claims 9-16 and 30-32

Claim 9 recites limitations similar to those mentioned for claim 1 and is allowable for much the same reasons as given for claim 1. Based on the foregoing, Appellant respectfully requests that the obviousness rejections of claims 9-16 and 30-32 be reversed, and the claims set for issue.

a) Claim 10

Claim 10 depends from claim 9 and is allowable for the same reasons. In addition, claim 10 is allowable for much the same reasons as given for claim 2. For at least these additional reasons, Appellant respectfully requests that the obviousness rejection of claim 10 be reversed and the claim set for issue.

b) Claim 11

Claim 11 depends from claim 9 and is allowable for the same reasons. In addition, claim 11 is allowable for much the same reasons as given for claim 3. For at least these additional reasons, Appellant respectfully requests that the obviousness rejection of claim 11 be reversed and the claim set for issue.

3. Claims 17-20 and 33-35

Claim 17 recites limitations similar to those mentioned for claim 1 and is allowable for much the same reasons as given for claim 1. Based on the foregoing, Appellant respectfully requests that the obviousness rejections of claims 17-20 and 33-35 be reversed, and the claims set for issue.

a) Claim 18

Claim 18 depends from claim 17 and is allowable for the same reasons. In addition, claim 18 is allowable for much the same reasons as given for claim 3. For at least these additional reasons, Appellant respectfully requests that the obviousness rejection of claim 18 be reversed and the claim set for issue.

b)   Claim 19

Claim 19 depends from claim 17 and is allowable for the same reasons. In addition, claim 19 is allowable for much the same reasons as given for claim 2. For at least these additional reasons, Appellant respectfully requests that the obviousness rejection of claim 19 be reversed and the claim set for issue.

4.   Claims 21-23

Claim 21 recites limitations similar to those mentioned for claim 1 and is allowable for much the same reasons as given for claim 1. Based on the foregoing, Appellant respectfully requests that the obviousness rejections of claims 21-23 be reversed, and the claims set for issue.

a)   Claim 22

Claim 22 depends from claim 21 and is allowable for the same reasons. In addition, claim 22 is allowable for much the same reasons as given for claim 2. For at least these additional reasons, Appellant respectfully requests that the obviousness rejection of claim 22 be reversed and the claim set for issue.

5.   Claims 24-26 and 36-38

Claim 24, in part, requires "instructions" that "cause the computer system to assign a unique identifier to a record stored at the record collection site and enter the unique identifier in a hierarchical tree structure" and that "cause the computer system to receive the hierarchical tree structure from the record collection site." For much the same reasons as given for claim 1, *Anderson* and *Simonetti*, considered individually or together, do not teach or suggest the above limitations. Based on the foregoing, Appellant respectfully requests that the obviousness rejections of claims 24-26 and 36-38 be reversed, and the claims set for issue.

a)   Claim 25

Claim 25 depends from claim 24 and is allowable for the same reasons. In addition, claim 25 is allowable for much the same reasons as given for claim 2. For at least these additional reasons, Appellant respectfully requests that the obviousness rejection of claim 25 be reversed and the claim set for issue.

B.   Conclusion

For the reasons stated above, Appellant respectfully submits that the Examiner erred in rejecting all pending claims. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,

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VIII.   CLAIMS APPENDIX

1.   (Previously   presented) A   computer   implemented   method   for representing records, the method comprising:

receiving an order for a transaction at a record collection site;

producing a record that represents the transaction at the record collection site;

storing the record in a memory location in a computer readable storage medium at the record collection site;

assigning a unique identifier to the record stored at the record collection site;

entering the unique identifier in a hierarchical tree structure stored in a computer readable storage medium at the record collection site, wherein the unique identifier comprises information for accessing the record in the memory location, and wherein the tree structure comprises a plurality of branches connected by nodes; and

sending the hierarchical tree structure to a central storage site.

2.   (Previously presented) The method of claim 1 further comprising:

using the unique identifier to produce an aggregate report of records collected by the record collection site; and

sending the aggregate report to the central storage site.

3.   (Previously presented) The method of claim 1 further comprising:

using the unique identifier at the central storage site to access the record stored at the record collection site.

4.   (Original) The method of claim 1, wherein the unique identifier includes information representing a node located in the hierarchical tree structure.

5.   (Original) The method of claim 4, wherein the node is located in a higher position of the hierarchical tree structure than the unique identifier.

6.   (Original) The method of claim 2, wherein using the unique identifier to produce the aggregate report includes counting the unique identifier with a second unique identifier assigned to a second record stored at the record collection site.

7.   (Original) The method of claim 2, wherein using the unique identifier to produce an aggregate report includes summing data included in the record accessed by the unique identifier with data included in a second record accessed by a second unique identifier.

8.   (Original) The method of claim 4, wherein a unique key that includes information representing a second node in the hierarchical tree structure is assigned to the node.

9.   (Previously presented) A computer program product, recorded in a computer-readable storage medium comprising logic instructions which, when executed on a processor, cause the processor to:

receive an order for a transaction at a record collection site;

produce a record that represents the transaction at the record collection site;

store the record in a memory location at the record collection site;

assign a unique identifier to the record stored at the record collection site;

enter the unique identifier in a hierarchical tree structure stored at the record collection site, wherein the unique identifier comprises information for accessing the record in the memory location, and wherein the tree structure comprises a plurality of branches connected by nodes; and

send the hierarchical tree structure to the central storage site.

10.   (Previously presented) The computer program product of claim 9, further comprising logic instructions recorded on the computer readable storage medium which, when executed on the processor, cause the processor to:

use the unique identifier to produce an aggregate report of records collected by the record collection site; and

send the aggregate report to a central storage site.

11.   (Previously presented) The computer program product of claim 9, further comprising logic instructions recorded on the computer readable storage medium which, when executed on the processor, cause the processor to:

use the unique identifier at the central storage site to access the record stored at the record collection site.

12.   (Original) The computer program product of claim 9, wherein the unique identifier includes information representing a node located in the hierarchical tree structure.

13.   (Original) The computer program product of claim 12, wherein the node is located in a higher position of the hierarchical tree structure than the unique identifier.

14.   (Previously presented) The computer program product of claim 10, further comprising logic instructions recorded on the computer readable storage medium which, when executed on the processor, cause the processor to count the unique identifier with a second unique identifier assigned to a second record stored in at the record collection site.

15.   (Previously presented) The computer program product of claim 10, further comprising logic instructions which, when executed on the processor, cause the processor to sum data included in the record accessed by the unique

identifier with data included in a second record accessed by a second unique identifier.

16.   (Original) The computer program product of claim 12, wherein a unique key that includes information representing a second node in the hierarchical tree structure is assigned to the node.

17.   (Previously   presented) A   computer   implemented   method   for representing records, the method comprising:

  receiving an order for a transaction at a record collection site;

  producing a record that represents the transaction at the record collection site;

  storing the record in a computer readable storage medium in a memory location at the record collection site;

  assigning a unique identifier to the record stored at the record collection site;

  entering the unique identifier in a hierarchical tree structure stored in a computer readable storage medium at the record collection site, wherein the unique identifier comprises information for accessing the record in the memory location, and wherein the tree structure comprises a plurality of branches connected by nodes;

  sending the hierarchical tree structure to a central storage site; and receiving the hierarchical tree structure at the central storage site from a record collection site, the hierarchical tree structure includes the unique identifier assigned to a record stored at the record collection site.

18.   (Original) The method of claim 17 further comprising: using the unique identifier to access the record stored at the record collection site.

19.   (Original) The method of claim 17 further comprising: receiving an aggregate report at the central storage site produced at the record collection site using the unique identifier.

20.   (Original) The method of claim 17, wherein the unique identifier includes information representing a node located in the hierarchical tree structure.

21.   (Previously presented) A computer implemented method for representing records, the method comprising:

receiving an order for a transaction at a record collection site;

producing a record that represents the transaction at the record collection site;

storing the record in a computer readable storage medium in a memory location at the record collection site;

assigning a unique identifier to the record stored at the record collection site;

entering the unique identifier in a hierarchical tree structure in a computer readable storage medium at the record collection site, wherein the unique identifier comprises information for accessing the record in the memory location, and wherein the tree structure comprises a plurality of branches connected by nodes;

sending the hierarchical tree structure to a central storage site; and

using the unique identifier at the central storage site to access the record stored at the record collection site.

22.   (Original) The method of claim 21, wherein the unique identifier at the record collection site is used to produce an aggregate report that is sent to the central storage site.

23.   (Original) The method of claim 21, wherein the unique identifier includes information representing a node located in the hierarchical tree structure.

24.   (Previously presented) A system comprising:

a record collection site that includes a computer system comprising logic instructions recorded on a computer readable storage medium which, when executed on computer system, cause the computer system to assign a unique identifier to a record stored at the record collection site and enter the unique identifier in a hierarchical tree structure; and

a central storage site that includes a computer system comprising logic instructions recorded on a computer readable storage medium which, when executed on computer system, cause the computer system to receive the hierarchical tree structure from the record collection site.

25.   (Previously presented) The system of claim 24, wherein the computer system at the record collection site further comprises logic instructions recorded on a computer readable storage medium which, when executed on computer system, cause the computer system to use the unique identifier to produce an aggregate report and initiate transmission of the aggregate report to the central storage site.

26.   (Original) The system of claim 24, wherein the unique identifier includes information representing a node located in the hierarchical tree structure.

27.   (Previously presented) The method of claim 1, wherein assigning a unique identifier to a record stored at a record collection site comprises:

producing a record at the record collection site;

producing a unique identifier for the record to allow the record to be identified, distinguished and accessed from the record collection site;

assigning a unique identifier to the record so that the record is distinguishable from other records produced at the record collection site; and

entering the unique identifier assigned to the record into a tree structure which is also stored at the record collection site.

28.   (Previously presented) The method of claim 27, wherein tree structure identifiers are assigned to similar record types and are grouped together thereby improving accessibility for the stored records.

29.   (Previously presented) The method of claim 28, wherein the tree structure is produced with a database software package capable of storing data in a balanced tree structure.

30.   (Previously presented) The computer program product of claim 9, further comprising logic instructions recorded on the computer readable storage medium which, when executed on the processor, cause the processor to:

produce a record at the record collection site;

produce a unique identifier for the record to allow the record to be identified, distinguished and accessed from the record collection site;

assign a unique identifier to the record so that the record is distinguishable from other records produced at the record collection site; and

enter the unique identifier assigned to the record into a tree structure which is also stored at the record collection site.

31.   (Previously presented) The computer program product of claim 30, wherein tree structure identifiers are assigned to similar record types and are grouped together thereby improving accessibility for the stored records.

32.   (Previously presented) The computer program product of claim 31, wherein the tree structure is produced with a database software package capable of storing data in a balanced tree structure.

33.   (Previously presented) The method of claim 17, wherein assigning a unique identifier to a record stored at a record collection site comprises:

producing a record at the record collection site;

producing a unique identifier for the record to allow the record to be identified, distinguished and accessed from the record collection site;

assigning a unique identifier to the record so that the record is distinguishable from other records produced at the record collection site; and

entering the unique identifier assigned to the record into a tree structure which is also stored at the record collection site.

34.   (Previously presented) The method of claim 33, wherein tree structure identifiers are assigned to similar record types and are grouped together thereby improving accessibility for the stored records.

35.   (Previously presented) The method of claim 34, wherein the tree structure is produced with a database software package capable of storing data in a balanced tree structure.

36.   (Previously presented) The system of claim 24, wherein a record collection site that includes a computer system that further comprises logic instructions recorded on a computer readable storage medium which, when executed on computer system, cause the computer system to:

produce a record at the record collection site;

produce a unique identifier for the record to allow the record to be identified, distinguished and accessed from the record collection site;

assign a unique identifier to the record so that the record is distinguishable from other records produced at the record collection site; and

enter the unique identifier assigned to the record into a tree structure which is also stored at the record collection site.

37.   (Previously presented) The method of claim 36, wherein tree structure identifiers are assigned to similar record types and are grouped together thereby improving accessibility for the stored records.

38.   (Previously presented) The method of claim 37, wherein the tree structure is produced with a database software package capable of storing data in a balanced tree structure.

IX.   EVIDENCE APPENDIX

None.

X.   RELATED PROCEEDINGS APPENDIX

None.